

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA *

VS.

CRIM.NUM. 97-137 (DRD)

FUNDADOR MORENO-MEDINA*

DEFENDANT # 2 *

*** * * * ***

INFORMATIVE MOTION AND MOTION FOR CONTINUANCE

TO THE HONORABLE COURT:

COMES NOW the undersigned attorney and very respectfully STATES and PRAYS as follow:

1. On August 6th., 2007 the undersigned filed a Motion to Withdraw defendant Moreno Medina legal representation.

2. Although the Court did not enter an Order granting such Motion, I rely on the fact that the Motion will be granted and decided not to attend the today hearing. Today the defendant called me and informed the Court did not grant my Motion so I have to appear before this Honorable Court this next Monday August 27th., 2007 at 9:00 A.M.

3. On that date this attorney has previously scheduled the case of People vs. Rafael Rodríguez Acevedo, KLA2007 G 0096-97, before Hon. J. Aldo González Quesada, Room 1107 of the San Juan Superior Court. Also, I need to finalized a Judicial Revision for the Puerto Rico Court of Appeals in the case of OEG v. David Cruz Vélez, OEG 06-08 that due on this August 29th., 2007.

4. Since the defendant has a case pending in the Aguadilla Superior Court for this September 11th., 2007, I respectfully request that the case be scheduled after that date for which I recommend the dates of the 17th., 19th., or 26th., of September 2007. I believe that waiting for the State Court decision might be useful in this case and maybe is the better way to solve it.

5. Now, I want to address the Court to the fact that my absent was not on purpose I always respect the Court orders and the Court itself. I really apologize for my non appearance and for any inconveniences that it may caused to the Honorable Court and to my brother counsels.

WHEREFORE is respectfully requested that this Honorable Court take notice of the above and, giving my excuses, consider our petition to continue the August 27th 2007 hearing.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which send notification to U.S. Probation Officer Benjamín Bonilla, Benjamin.Bonilla@prp.uscourts.gov, and A.U.S.A. José A. Ruíz..

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 23rd. day of August, 2007.

S/Jorge L.Díaz-Reverón
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